

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,
v.

GOOGLE LLC.

No. 19-cv-08655 (LGS)

Defendant.

**DECLARATION OF CARA GREENE IN OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND IN SUPPORT OF
PLAINTIFF'S CROSS MOTION FOR SUMMARY JUDGMENT**

I, Cara E. Greene, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. Pursuant to Federal Rule of Evidence 1006, following is a summary of compensation and performance review information for certain Technical Directors. This information is derived from the following documents: GOOG-ROWE-00078058, P0001700, GOOG-ROWE-00053780.R, GOOG-ROWE-00053790.R, GOOG-ROWE-00053774.R, GOOG-ROWE-00055387, GOOG-ROWE-00067247, GOOG-ROWE-00055387, GOOG-ROWE-00068458, GOOG-ROWE-00068460, GOOG-ROWE-00068462, GOOG-ROWE-00068464, GOOG-ROWE-00068466, GOOG-ROWE-00060591.

Compensation Information

2. **Ulku Rowe**, Level 8 Principal Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	5560	\$290,000	\$116,000	\$60,000
2018	5560	\$295,000	\$125,000	\$318,000
2019	5560	\$310,000	\$125,000	\$318,000
2020	5560	\$324,000	\$122,000	\$331000 (Grant 1) \$100,000 (Grant 2)
2021	5560	\$333,000		

3. [REDACTED] Comparator 1, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	5578	\$325,000	\$61,000	
2018	5578	\$334,000	\$143,000	\$500,000
2019	5578	\$348,000	\$182,000	\$620,000
2020	8317	\$370,000		

4. [REDACTED] Comparator 2, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	5578	\$315,000	\$152,000	\$400,000
2018	5578	\$334,000	\$174,000	\$650,000
2019	5007	\$356,000	\$140,000	\$320,000
2020	5007	\$358,000	\$175,000	\$400,000 (Grant 1) \$200,000 (Grant 2)
2021	5007	\$366,000		

5. [REDACTED] Comparator 4, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	5578	\$325,000	\$127,000	
2018	5578	\$325,000	\$156,000	\$483,000
2019	5578	\$332,000	\$146,000	\$460,000
2020	5578	\$332,000	\$132,800	\$200,000
2021	5578	\$336,000		

6. [REDACTED] Comparator 5, Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	5578	\$280,000	\$107,000	
2018	5578	\$295,000	\$153,000	\$685,000
2019	5578	\$310,000	\$149,000	\$615,000
2020	5578	\$319,000	\$140,000	\$368,000
2021	5566	\$323,000		

7. **Comparator 3** Level 9 Distinguished Technical Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2017	5578	\$335,000	\$163,000	\$170,000
2018	5578	\$346,000	\$180,000	\$650,000
2019	5578	\$369,000	\$174,000	\$595,000
2020	5578	\$378,000	\$166,000	\$432,000
2021	5578	\$378,000		

8. **Comparator 6** Level 9 Director, Solutions Consultant

	Job Code	Base Salary	Bonus Payment	Equity Grant Refresh
2018	5552	\$325,000	\$78,000	\$60,000
2019	5552	\$340,000	\$187,000	\$474,000
2020	5552	\$360,000		

Performance Review Ratings9. **Ulku Rowe** – Performance Ratings

	Q1	Q3
2017	Not Applicable	Exceeds Expectations
2018	Exceeds Expectations	Exceeds Expectations
2019	Exceeds Expectations	Exceeds Expectations
2020	Exceeds Expectations	Exceeds Expectations

10. **Nicholas Harteau**- Performance Ratings

	Q1	Q3
2017	Not Applicable	Not Applicable
2018	Consistently Meets Expectations	Consistently Meets Expectations
2019	Exceeds Expectations	Exceeds Expectations

11. **Evren Eryurek**- Performance Ratings

	Q1	Q3
2017	Consistently Meets Expectations	Exceeds Expectations
2018	Exceeds Expectations	Exceeds Expectations
2019	Consistently Meets Expectations	Consistently Meets Expectations
2020	Not Applicable	Exceeds Expectations

12. **Ben Wilson-** Performance Ratings

	Q1	Q3
2017	Not Applicable	Consistently Meets Expectations
2018	Exceeds Expectations	Consistently Meets Expectations
2019	Consistently Meets Expectations	Consistently Meets Expectations
2020	Not Applicable	Consistently Meets Expectations

13. **Jonathan Donaldson –** Performance Ratings

	Q1	Q3
2017	Not Applicable	Consistently Meets Expectations
2018	Exceeds Expectations	Exceeds Expectations
2019	Exceeds Expectations	Consistently Meets Expectations
2020	Not Applicable	Consistently Meets Expectations

14. **Paul Strong-** Performance Ratings

	Q1	Q3
2017	Consistently Meets Expectations	Exceeds Expectations
2018	Exceeds Expectations	Exceeds Expectations
2019	Exceeds Expectations	Consistently Meets Expectations
2020	Not Applicable	Consistently Meets Expectations

15. **Scott Penberthy-** Performance Ratings

	Q1	Q3
2017	Consistently Meets Expectations	Exceeds Expectations
2018	Exceeds Expectations	Exceeds Expectations
2019	Exceeds Expectations	Exceeds Expectations
2020	Not Applicable	Exceeds Expectations

16. **Massimo Mascaro-** Performance Ratings

	Q1	Q3
2018	Consistently Meets Expectations	Strongly Exceeds Expectations
2019	Strongly Exceeds Expectations	Strongly Exceeds Expectations
2020	Not Applicable	Strongly Exceeds Expectations

17. **Kawaljit Gandhi - Performance Ratings**

	Q1	Q3
2017	Exceeds Expectations	Consistently Meets Expectations
2018	Exceeds Expectations	Exceeds Expectations
2019	Strongly Exceeds Expectations	Strongly Exceeds Expectations
2020	Not Applicable	Strongly Exceeds Expectations

18. Google hired 17 individuals into the Technical Director position between March 2016 and March 2018. Plaintiff was the only woman Google hired for the role.

19. According to information contained in the L8-L9 Employee Snapshots, among 541 Engineering Directors (Technical Directors, SWE Directors, AE Directors, and PM Directors at Levels 8 and 9) Google employed between 2017 and 2019, only 45 are women.

20. I am a Partner in good standing at Outten & Golden LLP. I am admitted to practice in the State of New York and before this Court. I make these statements based on personal knowledge in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment and in support of Plaintiff's Cross-Motion for Summary Judgment.

Dated: December 6, 2021
New York, New York

/s/ Cara E. Greene
Cara E. Greene

OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, New York 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060